

EXHIBIT 23

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

PLANNED PARENTHOOD CENTER FOR CHOICE; <i>et al.</i> ,)	
)	
)	CIVIL ACTION
Plaintiffs,)	
)	CASE NO. 1:20-cv-323-LY
v.)	
)	
GREG ABBOTT, in his official capacity as Governor; <i>et al.</i> ,)	
)	
)	
Defendants.)	

**DECLARATION OF AMANDA BENNETT IN SUPPORT OF
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

AMANDA BENNETT, hereby declares under penalty of perjury that the following statements are true and correct:

1. I am a member of the non-hierarchical Board of Directors (“core member”) of the Bridge Collective—an Austin-based nonprofit organization that provides practical support to Texas residents who want to end a pregnancy but face practical and logistical difficulties accessing care.

2. Founded in 2012, Bridge Collective started as a team of full-spectrum doulas providing educational, emotional, and physical support to pregnant people seeking abortion, during childbirth, and soon after they gave birth. After Texas House Bill 2 shuttered abortion clinics across the state in 2014, client needs shifted. People did not need an abortion doula if they could not get to one of the few remaining in-state clinics. We accordingly shifted our focus and resources to supporting people seeking abortion care, specifically by providing rides. Today, we are an all-volunteer practical support collective providing information, rides, childcare, accommodation, and doula services to Texans seeking abortion care in the Austin-area.

3. I first joined Bridge Collective as a volunteer in the spring of 2016; last summer, I became a core member. Over the years, I have served as an intake coordinator and volunteer providing rides, accommodation, and emotional support. I also help recruit and train volunteers. I regularly speak with volunteers about our clients' needs concerning abortion access. I also speak directly with clients about their needs on a regular basis. In addition, I speak with other organizations providing financial and practical support to Texans seeking abortion care.

4. I provide the following testimony based on personal knowledge acquired through my service at Bridge Collective and review of the organization's business records.

Challenges Accessing Abortion Care in Texas

5. Bridge Collective operates a hotline and online intake system for people seeking assistance overcoming barriers to abortion care. Callers contact us and leave a message explaining their needs. An intake coordinator calls them back, usually within twenty-four hours. Currently, we have six intake coordinators who rotate daily. After identifying a caller's needs, the intake coordinator reaches out to our network of forty active volunteers to inquire about whether they are available to assist the caller. If so, the intake coordinator connects the volunteer with the caller.

6. Unfortunately, we are not always able to find a volunteer to help, especially for callers seeking rides or childcare who live outside of Austin. Generally, our callers have abortion appointments during work hours on weekdays, and it can be difficult to find available volunteers, most of whom also work during the day on weekdays. If we are unable to assist a caller, we do our best to connect them to another organization for assistance.

7. During the intake process, we assess the caller's needs, including whether they have an appointment scheduled, and if so, where; how far along in their pregnancy they are; whether they need a ride and if so, how many; and whether the caller needs accommodations, and if so, for

how many nights. We also inquire about whether the caller needs financial assistance. Although we do not have the resources to provide money to our callers, we do our best to help callers secure funds from other organizations. Ultimately, we work closely with our callers to develop a plan for accessing abortion care.

8. Our callers face many challenges to accessing abortion care in Texas. These challenges include lack of abortion providers, lack of access to reliable transportation, need for childcare, lack of emotional support for their abortion decision, an inability to take time off from work or school, and difficulty affording the cost of care.

9. Texas requires most abortion patients to make at least two trips to obtain care, which exacerbates the barriers that people seeking abortion care in Texas face. For example, forcing people to make two trips requires some people to travel long distances to an abortion provider twice, which increases the cost of travel and makes it harder to secure transportation and childcare. Some people opt to stay in Austin overnight rather than make multiple long-distance trips to a provider. That is not an option available to all clients, however. Some clients without childcare, for example, must return home to put their children to bed at night.

10. Delay can also make it harder for people to keep their pregnancies or abortion confidential. Callers seek to keep their pregnancy confidential for a variety of reasons. For example, callers have sought to keep their pregnancy or abortion decision confidential from an abusive partner or parent. Some callers want to keep their pregnancy or abortion decision confidential because no one in their network supports their decision and they fear judgment or irreparable damage to their relationships with family or friends.

11. It is not uncommon for our clients to miss an appointment or delay care because of difficulty overcoming barriers to care.

12. In 2019, over 314 Texans contacted Bridge Collective seeking assistance accessing abortion care.

13. The vast majority of our callers request rides to and from appointments. We provide rides to people located within 100 miles of Austin, and occasionally have helped clients who live even farther away. We routinely travel to Killeen, which is 70 miles away, one way, where there is a military base. In 2019, our volunteers provided 205 rides.

14. Our volunteers also regularly provide accommodation at their homes for clients who need a place to stay before or after their appointments, childcare during their appointments, company during their appointments, and emotional support during the rides to and from their appointments. We train all our volunteers to be supportive, non-judgmental listeners.

Abortion Access in Texas Since the Executive Order

15. The COVID-19 outbreak has impacted Texans' day-to-day lives, including the lives of our callers. For example, a client who I recently provided a ride to lost her job after Governor Abbott's stay-at-home order closed the restaurant at which she worked.

16. The COVID-19 outbreak has also adversely impacted Bridge Collective's ability to assist callers. For example, callers sometimes desire someone to accompany them to the clinic to provide emotional support, including while they are in the waiting room. Some callers must bring their children with them to the clinic and need someone to watch them during their appointment. Prior to the COVID-19 outbreak, our volunteers routinely accompanied clients to their appointments to provide emotional support, childcare, or both. Unfortunately, because of the need for COVID-19 related social distancing, we are unable to offer these services to our clients. Last month, I personally had to decline help to a caller who asked if someone could accompany her to her abortion appointment.

17. I understand that Texas has threatened to enforce an Executive Order by Governor Abbott as a ban on abortion care (the “Executive Order”), which has made abortion care virtually unavailable in Texas.

18. Most callers are referred to us by an abortion clinic after they make their appointments, though sometimes callers find out about us from another source (e.g., another organization providing financial or practical support to Texans seeking abortion care or through an online search). As a result, the vast majority of our callers already have an abortion appointment when they contact us.

19. In March, prior to the Executive Order, thirteen people had contacted us seeking assistance. Since March 23, we have received only five calls, which is far less than we would normally expect to receive. I believe our caller volume has dramatically declined because the Executive Order caused most doctors in Texas to stop providing abortions.

20. We referred two of the five callers since March 23 to other organizations for assistance because they were out of our service area (i.e., more than 100 miles from Austin). Because the Executive Order made most abortion care unavailable in Texas, one of those callers was seeking to travel to Oklahoma to access care.

21. Our volunteers attempted to help the other three callers obtain abortion care. Unfortunately, because of the Executive Order and related judicial decisions, each of their appointments was cancelled. To my knowledge, only one of these callers has been able to obtain an abortion to date.

22. One caller (who was driven by a volunteer to her state-manded pre-abortion appointment a week earlier) requested a ride to and from her medication abortion appointment. The volunteer drove the caller from her home to the closest abortion clinic, which was in Austin—

an approximately three-hour roundtrip drive. The caller had to make three appointments before she was able to obtain care—the first two appointments were cancelled because of the Executive Order and an interim court ruling. The client told us that she experienced a great deal of stress and anxiety throughout the process. She strongly desired an early abortion and the thought of having to delay her abortion to later in pregnancy was very upsetting to her. She preferred a medication abortion because, among other things, it felt more natural to her than a procedural abortion. In addition, because of COVID-19-related social distancing policies, her partner and child would not have been able to accompany her to a procedural abortion appointment. A medication abortion would allow the caller to pass her pregnancy at home, surrounded by her loved ones.

23. The Executive Order gave rise to uncertainty about how, when, and even whether, the caller would obtain an abortion, which caused her a great deal of distress. The possibility that she might be delayed to a point at which she would no longer be able to obtain a medication abortion in Texas was very stressful for her. The Executive Order made the client feel like she was doing something wrong, which exacerbated her stress and anxiety. She described contending with these challenges as the “worst day of [her] life.” The client was ultimately able to obtain a medication abortion. However, any additional delay would have pushed her past the gestational limit for obtaining a medication abortion in Texas.

24. Another caller who was eighteen weeks pregnant, as measured from the first day of the last menstrual period (“lmp”), called us seeking assistance accessing a dilation and evacuation abortion. The caller planned to travel from out of town to Austin and stay overnight at a hotel. She would be unable to drive herself to and from the clinic, however, because she would be sedated. She requested that we provide her rides between the clinic and her hotel. Her appointment was cancelled just after the Executive Order went into effect. After the court issued

a temporary restraining order, she made a second appointment. Her second appointment was canceled after the court of appeals allowed the Executive Order to go back into effect. With assistance from another organization, the caller now plans to travel to New Mexico, where she has an appointment at an abortion clinic later this month. Traveling out of state to New Mexico has always been difficult for our callers, but it is even harder now due to COVID-19. For example, this caller worried about whether it is safe to travel to New Mexico, and she struggled to understand New Mexico's rules concerning out-of-state travelers.

25. Another caller who past the gestational limit for medication abortion in Texas contacted us seeking a ride to an aspiration abortion appointment. Like many of our callers, her pregnancy was causing severe nausea. This happens so often that we ask every caller about it and recommend that our drivers keep nausea bags in their cars during the rides. Unfortunately, her March 25 appointment was cancelled due to the Executive Order.

26. The Executive Order has significantly and adversely impacted our callers. It has created confusion, uncertainty, and unnecessary delay. It has forced our callers to stay pregnant when they do not want to be. It has exacerbated the stress of dealing with an unwanted pregnancy and seeking abortion care in Texas.

Dated: April 15, 2020

/S/ Amanda Bennett

Amanda Bennett